

May 19, 2004

WASHINGTON STATE LABOR COUNCIL
ATTN: DIANE MCDANIEL
314 FIRST AVENUE WEST
SEATTLE WA 98119

Subject: Complaint filed against Washington State Farm Bureau - PDC Case No. 04-309

Dear Ms. McDaniel:

The Public Disclosure Commission staff has completed its investigation of your complaint received October 28, 2003, alleging that Washington State Farm Bureau (WSFB) violated RCW 42.17 by making in-kind contributions to a statewide initiative committee that were not reported.

Your complaint was reviewed in light of the following statute:

RCW 42.17.170 requires lobbyists registered with the PDC to file frequent and detailed reports of lobbying activities, including monetary and in-kind contributions made to candidates, political party organizations, and political committees, including statewide initiative committees.

You alleged that WSFB violated RCW 42.17 by making in-kind contributions to Workers Against Job Killing Rules (WAJKR), a political committee supporting Initiative 841, without reporting those contributions. Specifically, you alleged that WSFB employee Dean Boyer was listed as a "Press Contact" on the WAJKR website, and that his activities in support of I-841 were not reported.

We found that:

- WSFB is a lobbyist employer that employed seven registered lobbyists during 2003.
- WSFB included with its response, a declaration from R. Dean Boyer, Director of Public Relations for the WSFB, in which Mr. Boyer stated that he did not attend any meetings, rallies, editorial boards, press conferences, or other campaign event or gathering sponsored by the WAJKR.

- Mr. Boyer stated that he was not aware that he had been listed as a press contact by the "Yes on I-841" campaign until he received a copy of the complaint. Mr. Boyer went on to state that during the normal course of his work as Director of Public Relations for WSFB, he recalled speaking with two newspaper reporters about I-841, and said he might have had one or two other brief telephone conversations with reporters about I-841. He reiterated that during those conversations there was not any mention that he had been listed as a media contact for WAJKR on their website. At no time was Mr. Boyer speaking on behalf of, in concert with, or at the request or suggestion of WAJKR.

No evidence was provided by you, nor was any evidence found during the course of our investigation, substantiating your allegation that WSFB or Dean Boyer engaged in "press contacts" that were reportable under Chapter 42.17. RCW.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Vice Chair of the Public Disclosure Commission, acting on behalf of the Chair, I am dismissing your complaint against the Washington State Farm Bureau.

During the investigation, the WSFB acknowledged its late reporting of a \$50,000 monetary contribution to WAJKR. An enforcement hearing for that issue has been scheduled for the May 26, 2004 Commission meeting, and is being included as part of Case No. 04-309.

If you have questions, please contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll free at 1-877-601-2828.

Sincerely,

Vicki Rippie
Executive Director

c: Pat Batts, WSFB